

ANTI-FRAUD AND SANCTIONS POLICY FOR WILDE GANZEN PARTNERS

This document outlines the steps that Wilde Ganzen takes to prevent fraud and how we will respond if we receive reports or have our own suspicions of potential fraud.

Wilde Ganzen defines fraud as deliberate non-compliance with contractual obligations for the purposes of personal gain.

Fraud Risk

Wilde Ganzen tries to restrict the risk of fraudulent use of project funds to a minimum. This is done by:

- thoroughly screening project partners (through desk research, but when in doubt through local consultants or by requesting references from other organisations that have worked with the specific project partner);
- a careful assessment of the submitted project and fundraising proposals;
- requesting and reviewing the documents that are legally required for the organisations involved and for the implementation of the project;
- signing collaboration agreements with the project partners wherein the mutual obligations and the purpose of the funding is defined and both parties are aware of the total amount of the available project budget;
- established procedures regarding payment, wherein a segregation of duties ensures that the transfer and its control are completed by different people;
- keeping all project involved partners informed of the payments;
- monitoring approved projects;
- requiring the project partners to submit a final report as a conclusion of the project and evaluating it;

The Dutch or Belgian project partner will collect part of the budget themselves. This ensures that they feel partly responsible for the appropriate spending of the funds and the implementation of the project.

Procedure and sanctions in case of suspected or observed fraud

When incidents of observed or suspected fraud still occur in the collaboration, the following steps are taken:

- The project partners have to report suspected or observed fraud immediately to Wilde Ganzen.
- Anyone who suspects or observes fraud is permitted to report it.
 - Externally, this can be done via the Wilde Ganzen service desk: servicedesk@wildeganzen.nl, phone: +31 (0)33 – 204 5555.
 - Internally, reports can be made to the manager of Projects and Relationship Management and the secretary of the fraud committee.
- The manager of Projects and Relationship Management will decide the urgency in relation to taking steps to limit the damages and can immediately take the following actions if necessary:
 - informing the parties involved;
 - organising an urgent meeting with the fraud committee;
 - freezing payment of the project budget.
- The secretary of the fraud committee will enter the report into the fraud risk registry.

- The fraud committee will start the investigation of the report and will be supported by the project advisor and the relationship manager of the parties involved.
- Contact is made with the project partners in all cases, so that they are put in a position to share their views.
- After the investigation, the fraud committee will enter the conclusion into the fraud registry.
- Based on the conclusion, additional measures will be taken where necessary.

Measures may include:

- suspension of payment or no further payment of available resources;
- marking the fraudulent organisation as one with which we no longer want to collaborate. This information may be shared with third parties;
- recovery of funds already paid;
- taking legal action.

Working structures and responsibilities

- The fraud committee meets once a month.
- A member of the Supervisory Board will join the meeting twice a year.
- The director is head of the fraud committee and bears the final responsibility for the policy and the implementation of the agreed measures.